

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

SHARON BOBBITT, Individually on Behalf of All Others Similarly Situated, Plaintiff, v. ANDREW J. FILIPOWSKI and MICHAEL P. CULLINANE, Defendants.	Civ. No. 1:04 CV 12263 (PBS)
---	------------------------------

**UNOPPOSED MOTION TO EXTEND TIME FOR DEFENDANTS TO FILE REPLY
IN SUPPORT OF MOTION TO DISMISS SECOND CONSOLIDATED COMPLAINT**

Defendants Andrew J. Filipowski and Michael P. Cullinane, by their undersigned counsel, hereby request a two-week extension, until October 24, 2005, to file the Reply in support of their Motion to Dismiss the Second Consolidated Complaint in this matter. In support of this motion, Defendants state as follows:

1. By Order dated March 25, 2005, the Court granted the parties' joint motion to set a briefing schedule, including a reply for Defendants, on Defendants' then-anticipated Motion to Dismiss the Second Consolidated Complaint.

2. Defendants filed their Motion to Dismiss on April 7, 2005. The date for Plaintiffs to respond to that Motion was thereafter extended from time to time, given, among other things, the parties' ongoing efforts to mediate this dispute.

3. Plaintiffs filed their response to the Motion to Dismiss on September 12, 2005. Defendants' reply is currently due October 10, 2005. A hearing on the Motion to Dismiss is not scheduled to take place until November 3, 2005.

4. Given various professional commitments, counsel for Defendants require an additional two weeks, until October 24, 2005, within which to file the Reply in support of the Motion to Dismiss.

5. Counsel for Defendant Filipowski has conferred with lead Plaintiffs' counsel, who have indicated that they do not oppose the requested extension.

WHEREFORE, Defendants respectfully request that the Court enter an order extending by two weeks, until October 24, 2005, the date to file the Reply in support of Defendants' Motion to Dismiss the Second Consolidated Complaint.

Dated: September 26, 2005

Respectfully submitted,

/s/ Thomas D. Brooks

Halye A. Sugarman
HANIFY & KING
One Beacon Street
Boston, MA 02108
Tel.: (617) 423-0400

Thomas D. Brooks
SPERLING & SLATER
55 W. Monroe Street, Suite 3200
Chicago, IL 60603
Tel.: (312) 641-3200

Counsel for Defendant Andrew J. Filipowski

/s/ Joseph E. Collins

Bruce S. Barnett

DLA PIPER RUDNICK GRAY CARY US
LLP

One International Place, 21st Floor

Boston, MA 02110

Tel.: (617) 406-6000

Joseph E. Collins

DLA PIPER RUDNICK GRAY CARY US
LLP

203 North La Salle Street, Suite 1800

Chicago, IL 60601

Tel.: (312) 368-4000

Counsel for Defendant Michael P. Cullinane

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

**SHARON BOBBIT, individually on Behalf
Of All Others Similarly Situated,**

Plaintiff,

V.

ANDREW J. FILIPOWSKI and,
MICHAEL CULLINANE,

Defendants.

Civ. No. 1:04 CV 12263 (PBS)

CERTIFICATE OF SERVICE

I, D. Ethan Jeffery, hereby certify that on September 27, 2005, I caused a copy of the *Unopposed Motion to Extend Time for Defendants to File Reply in Support of Motion to Dismiss Second Consolidated Complaint*, to be served via first class mail to the parties listed on the attached service list.

/s/ D. Ethan Jeffery
D. Ethan Jeffery (BBO # 631941)
HANIFY & KING
Professional Corporation
One Beacon Street
Boston, MA 02108
(617) 423-0400 – Phone
(617) 556-8985 – Facsimile
dej@hanify.com - Email

Dated: September 27, 2005
438446

Bobbitt Labels – Case No. 1:04-cv-12263-PBS

420534

Bruce S. Barnett
DLA Piper Rudnick Gray Cary US LLP
One International Place
Boston, Massachusetts 02110

Douglas W. Hyman
Samuel B. Isaacson
Joseph Edward Collins
Piper Rudnick
203 North LaSalle Street
Suite 1900
Chicago, IL 60601

David Pastor
Gilman and Pastor, LLP
60 State Street, 37th Floor
Boston, Massachusetts 02109

Marvin A. Miller, Esq.
Christopher B. Sanchez, Esq.
Jennifer Winter Sprengel, Esq.
Miller Faucher and Cafferty LLP
30 North LaSalle Street, Suite 3200
Chicago, IL 60602

Guri Ademi, Esq.
Shpetim Ademi, Esq.
Ademi & O'Reilly
3620 East Layton
Cudahy, WI 53110

Clerk of Court
United States District Court
For The District Of Massachusetts
United States Courthouse
1 Courthouse Way
Boston, MA 02210

Samuel H. Rudman
David A. Rosenfeld
Lerach Coughlin Stoia Geller
Rudman & Robbins, LLP
200 Broadhollow Road, Suite 406
Melville, NY 11747

Lawrence A. Wojcik
Joseph Collins
Piper Rudnick
203 North LaSalle Street
Suite 1800
Chicago, IL 60601

Howard T. Longman, Esq.
Stull, Stull & Brody
Six East 45th Street
New York, NY 10017

Bruce C. Howard, Esq.
Law Offices of Robert D. Allison
122 South Michigan Avenue 1850
Chicago, IL 60603

Marc A. Topaz, Esq.
Schiffrin & Barroway, LLP
Three Bala Plaza East
Suite 400
Bala Cynwyd, PA 19004

Bruce S. Sperling, Eugene J. Frett
Thomas D. Brooks, Celiza Patricia Braganca
Sperling & Slater
55 West Monroe Street
Suite 3200
Chicago, IL 60603

John A.D. Gilmore, Esq.
Piper Rudnick LLP
One International Place
Boston, Massachusetts 02108

Martin D. Chitwood, Esq.
Chitwood Harley Harnes LLP
2300 Promenade II
1230 Peachtree Street, N.E.
Atlanta, GA 30309